EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. SANTANDER CONSUMER USA Inc., Defendant.	))))))))))	No. 3:15-cv-633

ADDENDUM TO CONSENT ORDER

WHEREAS on February 25, 2015, the United States filed its Complaint (the "Complaint") in this matter, alleging that the Defendant Santander Consumer USA, Inc. has engaged in a pattern or practice of conduct in violation of the Servicemembers Civil Relief Act ("SCRA"), 50 U.S.C. App. §§ 501-597b, for its involvement in illegally repossessing more than 1,100 motor vehicles from servicemembers during their military service between January 1, 2008 and February 28, 2013;

WHEREAS on February 26, 2015, the Court approved a Consent Order (the "Consent Order") fully and finally resolving the claims of the United States in this matter and requiring Defendant to deposit $9,360,000 into a Settlement Fund for aggrieved persons; and

WHEREAS on March 19, 2015, Defendant informed the United States of inadvertent errors in information that Defendant previously provided to the United States. The United States had relied on the faulty information during the parties' settlement negotiations;

Therefore, it is hereby ORDERED, ADJUDGED and DECREED:

1. Paragraph 19 of the Consent Order is revised to reflect that the United States has determined that Defendant conducted 785 motor vehicle repossessions between January 1, 2008 and February 28, 2013 that were not in compliance with the SCRA.

2. Paragraph 20 of the Consent Order is revised to reflect that the United States has determined that Defendant, after buying certain deficiency balances from an unrelated third-party, sought to collect repossession-related fees assessed as part of an additional 327 motor vehicle repossessions that occurred between January 1, 2008 and February 28, 2013 and was not in compliance with the SCRA.

3. Within five (5) days of the entry of this Order, Defendant will deposit an additional $125,000.00 into the interest-bearing escrow account previously established pursuant to Paragraph 18 of the Consent Order to fund the additional compensation payments required by Paragraph 21 of the Consent Order based upon the revised loan counts in Paragraphs 19 and 20 of the Consent Order.

4. Nothing herein shall affect Defendant’s other obligations under the Consent Order.

SO ORDERED, this ___ day of _____, ____.

____
UNITED STATES DISTRICT JUDGE

The undersigned hereby apply for and consent to the entry of the Order:

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